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Hearing Date: March 3, 2021  
Hearing Time: 10:00 AM  
Objection Date: February 24, 2021

*Attorneys for Defendants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,  
Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Adv. Pro. No. 10-04438 (CGM)

Plaintiff,

v.

ESTATE OF SEYMOUR EPSTEIN,

MURIEL EPSTEIN, as beneficiary of the Estate of  
Seymour Epstein and/or trusts created by the Last  
Will and Testament of Seymour Epstein, as  
executor of the Estate and/or trustee of the Trusts  
created by the Last Will and Testament of Seymour  
Epstein,

HERBERT C. KANTOR, trustee of the Trusts  
created by the Last Will and Testament of Seymour  
Epstein,

and

SHELBYNE SHIRT COMPANY, INC.,

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Defendants.

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 5, 2021, I caused a true and correct copy of the following documents:

- Notice of Motion for Relief from Judgment, Consideration of Objections, Entry of Counter-Proposed Order and Stay of Judgment Pending Appeal;
- Proposed order;
- Memorandum of Law in Support of Motion; and
- Declaration of Helen Davis Chaitman with Exhibits A through G,

to be served upon all parties in this action who receive electronic service through CM/ECF and by electronic mail upon the parties listed below:

David J. Sheehan, Esq.  
[dsheehan@bakerlaw.com](mailto:dsheehan@bakerlaw.com)  
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New York, New York 10111

I declare under penalty of perjury that the foregoing statements are true and correct

Dated: New York, New York  
February 5, 2021

/s/ Helen Davis Chaitman